



CONSOLIDATED METCO, INC.

November 27, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0002 1718 9670

Ms. Audrey O'Brien
Air Quality Program – Northwest Region
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201

RE: Consolidated Metco, Inc. – Rivergate Plant
Notice of Air Permit Termination – ACDP
Air Permit No. 26–1890

Dear Ms. O'Brien:

Consolidated Metco, Inc has terminated all manufacturing at its Rivergate facility in Portland, Oregon. One natural gas-fired drop bottom heat-treating furnace and one fluidized bed heat treatment system will remain in use for research and development purposes. All other manufacturing equipment is currently being removed from the facility with the goal of completion by February 1st, 2008. Consolidated Metco, Inc will send a letter to the Oregon Department of Environmental Quality when all process equipment has been removed.

Approximately 30,000 lbs of aluminum will be processed during research and development until the plant is scheduled to completely close. Calculations of projected facility wide PM, PM₁₀, NO_x, SO₂, and CO emissions are included in the attached sheet. All pollutant emissions will be below de minimis levels (OAR 340–200–0020(31)), therefore no air permit is required.

If you have any questions, please contact me at (503) 240–5493 or Doug Bensinger of Bensinger & Garrison Environmental, Inc. at (919) 484–8536.

Sincerely,
CONSOLIDATED METCO, INC.

Ernie Nimister
Manager, Environmental Compliance & Safety

Enclosure

cc: Doug Bensinger, Bensinger & Garrison Environmental, Inc.

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT NO. 26-1890**

Material throughput rates

The maximum throughput rate of aluminum is 1,000 lbs/ hr. It is estimated that 30,000 lbs of aluminum will be processed during Research and Development. Therefore, 30,000 lbs Aluminum/ 1,000 lbs/hr processed = 30 hours of processing.

Combustion Emission Rates - Fluidized Bed Heat Treatment System

The fluidized bed system has a peak heat input rate of 1.2 mmBTU/hr. Keppel Seghers estimated average gas usage at 0.6 mmBTU/hr to 1.0 mmBTU/hr. For purposes of estimating combustion emissions, we have conservatively assumed 1.0 mmBTU/hr average heat input.

Actual Gas Use: $1 \times 10^6 \text{ BTU/hr} \times 1 \text{ ft}^3/1020 \text{ BTU} \times 30 \times 0.85 = 0.025 \text{ cf}^3/\text{yr}$
 Potential Gas Use: $1 \times 10^6 \text{ BTU/hr} \times 1 \text{ ft}^3/1020 \text{ BTU} \times 8760 = 8.59 \times 10^6 \text{ cf}^3/\text{yr}$

TABLE 1: PROJECTED EMISSIONS - FLUIDIZED BED HEAT TREATMENT SYSTEM (S-H14)

Pollutant	Process Emissions			Combustion Emissions			TOTAL EMISSIONS			
	Emissions Factor lb/hr	Projected Actual lb/yr	Potential To Emit lb/yr	Emissions Factor lb/MMBtu	Projected Actual lb/yr	Potential To Emit lb/yr	Projected Actual lb/yr	Potential To Emit lb/yr	Projected Actual lb/yr	Potential To Emit lb/yr
CO	<1.5	38.25	13140	20	0.50	171.8	38.75	13311.8	0.019375	6.66
Total PM	<1.0	25.5	8760	2.5	0.06	21.5	25.56	8781.5	0.012781	4.39
PM ¹⁰	<1.0	25.5	8760	2.5	0.06	21.5	25.56	8781.5	0.012781	4.39
Total Hydrocarbons	< 0.28	7.1	2453	2.6	0.07	22.3	7.21	2475.1	0.003603	1.24
NOx	NA	0.0	0.0	100	2.5	859.0	2.50	859.0	0.00125	0.43

*Projected Actual Emissions - based on 30 hr/yr at 85% operating efficiency
 Maximum Emissions - based on 8760 hr/yr*

The maximum throughput rate of aluminum is 1,000 lbs/ hr. It is estimated that 30,000 lbs of aluminum will be processed during Research and Development. Therefore, 30,000 lbs Aluminum/ 1,000 lbs/hr processed = 30 hours of processing.

Combustion Emission Rates - Furnace

The fluidized bed system has a peak heat input rate of 6 mmBTU/hr.

Actual Gas Use: $6 \times 10^6 \text{ BTU/hr} \times 1 \text{ ft}^3/1020 \text{ BTU} \times 30 \times 0.85 = 1.5 \text{ cf}^3/\text{yr}$
 Potential Gas Use: $6 \times 10^6 \text{ BTU/hr} \times 1 \text{ ft}^3/1020 \text{ BTU} \times 8760 = 51.5 \times 10^6 \text{ cf}^3/\text{yr}$

CALCULATIONS:

Consolidated Metco, Inc
 Rivergate Facility, Portland, Oregon
 Air Permit Termination

PROJECT NO.: 156604
 DATE: Nov. 2007

CALCS BY: WZB
 FILE: Air Permit Termination



**BENSINGER & GARRISON
 ENVIRONMENTAL, INC.
 BLUEFIELD ENGINEERING, P.C.**

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 OF 3

CONSOLIDATED METCO, INC. - RIVERGATE PLANT
EMISSION COMPLIANCE DEMONSTRATION - FURNACE
TABLE 2

Year: 2008

SOURCE	Monthly Usage Or Throughput	Units	PM EMISSIONS		PM ₁₀ EMISSIONS		VOC EMISSIONS		NOx EMISSIONS		CO EMISSIONS	
			Emission Factor	Emissions lbs/yr	Emission Factor	Emissions lbs/yr	Emission Factor	Emissions lbs/yr	Emission Factor	Emissions lbs/yr	Emission Factor	Emissions lbs/yr
Al Poured -Furnaces		tons/yr	0.416 lb/ton	12.48	0.025 lb/ton	0.75						
Fugitives		tons/yr	2.540 lb/ton	76.20	1.520 lb/ton	45.60						
Natural Gas Usage		MMcf/yr	2.500 lb/MMcf	3.75	2.500 lb/MMcf	3.75	5.3 lb/MMcf	7.95	100 lb/MMcf	150.00	20 lb/MMcf	30.00
MONTHLY TOTAL			Pounds	92.43		50.10		7.95		150.00		30.00
			Tons	0.05		0.03		0.00		0.08		0.02

CALCULATIONS:

Consolidated Metco
Rivergate Facility, Portland, Oregon
Air Permit Termination Calcs



BENSINGER & GARRISON
ENVIRONMENTAL, INC.
BLUEFIELD ENGINEERING, P.C.

PROJECT NO.: 156604
DATE: Nov. 2007
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FILE: Air Permit Termination

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OF 3

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT NO. 26-1890**

TABLE 3: CY 2008 ACTUAL FACILITY-WIDE EMISSIONS

Year		Annual Emissions (lbs/yr)				
		PM	PM-10	VOC	NOx	CO
Furnace		92.43	50.10	7.95	150.00	30.00
Fluidized Bed		25.56	25.56	0.00	2.50	38.75
Total		117.99	75.66	7.95	152.50	68.75
Permit Limits		2000	2000	2000	2000	2000

CALCULATIONS:

Consolidated Metco
Rivergate Facility, Portland, Oregon
Air Permit Termination Calcs



**BENSINGER & GARRISON
ENVIRONMENTAL, INC.
BLUEFIELD ENGINEERING, P.C.**

PROJECT NO: 156604
DATE: Nov. 2007
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FILE: Air Permit Termination

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OF

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**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT NO. 26-1890**

TABLE 3: CY 2008 ACTUAL FACILITY-WIDE EMISSIONS

Year		Annual Emissions (lbs/yr)				
		PM	PM-10	VOC	NOx	CO
Furnace		46.22	25.05	3.98	75.00	15.00
Fluidized Bed		12.78	12.78	0.00	1.25	19.38
Total		59.00	37.83	3.98	76.25	34.38

De minimis levels	2000	2000	2000	2000	2000
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**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT NO. 26-1890**

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Total		117.99	75.66	7.95	152.50	68.75
De minimis levels		2000	2000	2000	2000	2000



Department of Environmental Quality

POSTED

JAN 21

522 S.W. FIFTH AVENUE, BOX 1760, PORTLAND, OREGON 97207 PHONE: (503) 229-5696

PRODUCTION CONTROL

JAN 16 1987

Consolidated Metco, Inc.
P. O. Box 03201
Portland, OR 97203

Re: Renewal of Air Contaminant
Discharge Permit No. 26-1890
Application No. 11596

The Department of Environmental Quality has completed processing your application for an Air Contaminant Discharge Permit. Based on the material contained in the application we have issued a proposed permit (copy enclosed).

This permit will become effective in 20 days from the date of this letter, unless the Department has received comments from you within that time. The permit is issued pursuant to Oregon Revised Statutes 468.310 and 468.320 and Oregon Administrative Rules 340-14-005 through 340-14-050, and 20-140 through 20-185.

If after the permit becomes effective you wish to appeal any of the conditions or limitations contained in the permit, you must request a hearing before the Environmental Quality Commission or its authorized representative by contacting the Department in writing within 40 days from the date of this letter in accordance with OAR 340-14-040 and ORS 183.

You are urged to carefully read the permit and to take all possible steps to comply with the conditions contained therein to help protect the environment of Oregon.

If you have any questions, please contact our Northwest Regional office in Portland at 229-5263.

Sincerely,

Lloyd Kostow, Manager
Program Operations
Air Quality Division

LJM:d
AD75
Enclosure
cc: Northwest Region, DEQ
EPA

Permit Number: 26-1890
Expiration Date: 06/01/95
Page 1 of 2

MINIMAL SOURCE AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
811 Southwest Sixth Avenue, Portland, OR 97204
Telephone: (503) 229-5696

Issued in accordance with the provisions of ORS 468.310 and OAR 340-20-155(5)

ISSUED TO:

Consolidated Metco, Inc.
P.O. Box 08201
Portland, OR 97203

INFORMATION RELIED UPON:

Application No.: 11596
Date Received: 07/23/86

FOR FACILITY LOCATED AT:

13940 N. Rivergate Blvd.
Portland, OR 97203


TYPE OF FACILITY:

Non-ferrous metals
foundries

STANDARD INDUSTRY CODE:

SIC: 3361

ISSUED BY DEPARTMENT OF ENVIRONMENTAL QUALITY


Fred Hansen, Director

JAN 16 1987

Dated

PERMIT CONDITIONS

1. Compliance with the specific requirements, limitations, and conditions contained herein shall not relieve the permittee from complying with all laws, rules, and standards administered by the Department.
2. The permittee shall at all times maintain and operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness, such that the emissions of air contaminants are kept at the lowest practicable levels.
3.
 - a. In Clackamas, Columbia, Multnomah, or Washington counties: Emissions from any air contaminant source except fuel burning equipment shall not exceed an opacity equal to or greater than twenty (20) percent for a period aggregating more than thirty (30) seconds in any one hour.
 - b. In all other areas of the state and all fuel burning equipment: Emissions from any air contaminant source shall not exceed an opacity equal to or greater than twenty (20) percent for a period aggregating more than three (3) minutes in any one hour.

4. The permittee shall, as necessary, conduct dust suppression measures such as paving or watering of heavily traveled roads and shall operate all air contaminant generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times. Fugitive dust, for the purpose of this permit, is defined as any emission source not collected and treated in an air pollution control device.
5. The permittee is prohibited from conducting any open burning.
6.
 - a. The permittee shall notify the Department before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to; or emissions are significantly changed or increased.
 - b. Any proposed increase in emissions will require that the permittee apply for and obtain a modification to the current permit prior to initiating any changes.
7. The permittee shall promptly notify the Department of any change of plant site address, mailing address, company name, or plant ownership.
8. At least one compliance determination inspection and at least one compliance determination fee for this source will be required within five years of the issuance date of this permit. The permittee will be invoiced according to the fee schedule in effect at the time the fee is due.
9. The Department has determined that this source has minimal emissions, insignificant impact on air quality in the area, and creates no nuisance conditions of any kind. This minimal source permit is subject to revocation at any time this source no longer meets the Department's criteria for a minimal source. Revocation of this minimal source permit will result in requirements for annual inspections and annual fees.

ALL INQUIRIES SHOULD BE DIRECTED TO:

Department of Environmental Quality
Northwest Regional Office
811 Southwest Sixth Ave.
Portland, OR 97204
Telephone: (503) 229-5263

Department of Environmental Quality
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

Consolidated Metco, Inc.
P.O. Box 03201
Portland, OR 97203

Background

1. Consolidated Metco, Inc. operates a non-ferrous metals foundry located at 13940 N. Rivergate Blvd., Portland, Oregon.
2. The annual production capacity is approximately 3,500 tons of aluminum castings.
3. Existing visible and particulate emission sources at the facility consist of the following:
 - 1 Bead-Blaster Baghouse
 - 1 Sand-Blaster Baghouse
 - 1 Afterburner for Chip Reclaiming Furnace
 - 3 Gas-Fired Reverberatory Furnaces
 - 8 Electric Reverberatory Furnaces
4. The emission control system includes 2 baghouses and 1 afterburner.
5. The estimated annual rate of particulate emissions is 2.3 tons.
6. The foundry is operated 24 hours per day, 5 days per week, and 52 weeks per year.
7. The furnaces are operated 16 hours per day, 5 days per week, and 52 weeks per year.
8. Estimated annual fuel consumption consists of the following:
 - a. 840,000 therms natural gas.

Evaluation

9. The facility was inspected on 10/17/86 and found in compliance with all permit emission limits. During the prior permit period, no complaints were received
10. The proposed permit is a renewal for an existing Air Contaminant Discharge Permit which expired on June 1, 1985.

Recommendation

11. The anticipated particulate emissions are less than five tons per year. This source currently meets the other criteria for a Minimal Source Permit and a Minimal Source Permit will be issued.
12. It is recommended that the proposed permit be approved for issuance to Consolidated Metco, Inc.

HMD:LJM:a
P26189.0R



Oregon

Theodore Kulongoski, Governor

cc: BAG 8/10/04

Department of Environmental Quality

Northwest Region Portland Office

Air Quality Program

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5554

FAX (503) 229-5265

TTY (503) 229-5471

AUG 06 2004

Consolidated Metco, Inc.
Attn: Ernie Nimister
PO Box 83201
Portland, Oregon 97283-0201

Re: Issuance of Air Contaminant Discharge Permit
Permit # 26-1890

The Department of Environmental Quality has completed processing your application for renewal of your Standard Air Contaminant Discharge Permit. Based on the material contained in the application, we have issued the enclosed permit.

The effective date of the permit is the date it was signed by the regional Air Quality Manager. The signature and date appear on the first page of the document. The permit is issued pursuant to Oregon Revised Statutes 468A and Oregon Administrative Rules (OAR) 340-14-005 through 340-14-050, and 216-0010 through 216-0100.

You may appeal conditions or limitations contained in the attached permit by applying to the Environmental Quality Commission, or its authorized representative, within twenty days from the date of this letter. Appeals are pursuant to ORS Chapter 183 and OAR Chapter 340, Division 14-025(6). Appeal procedures are contained in OAR Division 11-005 through 11-140.

A copy of the current permit must be available at the facility at all times. Failure to comply with permit conditions may result in civil penalties. **You are expected to read the permit carefully and comply with all conditions** to protect the environment of Oregon.

If you have any questions, please contact Kathy Amidon at (503) 229-5568.

Sincerely,

Ed Druback
Air Quality Manager
Northwest Region

KA/EJD: cab
Enclosure

Cc: Michelle Butler/AQ
Rindy Ramos - Region X
KA/NWR



STANDARD
AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
Northwest Region
2020 SW 4th Avenue, #400
Portland, Oregon 97201
(503) 229-5554

This permit is being issued in accordance with the provisions of ORS 468A.040 and
based on the land use compatibility findings included in the permit record.

ISSUED TO:

Consolidated Metco, Inc.
PO Box 83201
Portland, OR 97283-0201

INFORMATION RELIED UPON:

Application No.: 018007
Date Received: 3/20/00

US EPA Letter dated 3/5/04

PLANT SITE LOCATION:

13940 N. Rivergate Blvc.
Portland, OR 97203

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Portland
Approval Date: 3/31/95

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY


Ed Druback, Northwest Region Air Quality Manager

AUG 06 2004
Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-0020):

Table 1 Code	Source Description	SIC
Part B, 63	Secondary smelting an/or refining of ferrous and non-ferrous metals	3365

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1.0 GENERAL EMISSION STANDARDS AND LIMITS

- 1.1. Visible Emissions** The permittee must not allow emissions from any air contaminant source to equal or exceed 20% opacity for a period aggregating more than 30 seconds in any one hour.
- 1.2. Particulate Matter Emissions** The permittee must comply with the following particulate matter emission limits, as applicable:
- a. Particulate matter emissions from any air contaminant source installed on or before June 1, 1970 other than fugitive emission sources must not exceed 0.2 grains per standard cubic foot.
 - b. Particulate matter emissions from any air contaminant source installed, constructed, or modified after June 1, 1970 fugitive emission sources must not exceed 0.1 grains per standard cubic foot.
- 1.3. Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions by:
- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
 - b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
 - c. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.
- 1.4. Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 1.5. Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by Department personnel.

2.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 2.1. **Work practices** The permittee must store the dross inside the facility until the dross is disposed or sold for recycling.

3.0 PLANT SITE EMISSION LIMITS

- 3.1. **Plant Site Emission Limits (PSEL)** Plant site emissions must not exceed the following:

Pollutant	Limit	Units
PM	44	tons per year
PM ₁₀	26	tons per year
NO _x	46	tons per year
CO	99	tons per year
VOC	39	tons per year

- 3.2. **Annual Period** The annual plant site emissions limits apply to any 12-consecutive calendar month period.

4.0 COMPLIANCE DEMONSTRATION

- 4.1. **PSEL Compliance Monitoring** Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = \Sigma(EF \times P)/2000 \text{ lbs}$$

where,

$$\begin{aligned} E &= \text{pollutant emissions (ton/yr);} \\ EF &= \text{pollutant emission factor (see condition 10.0);} \\ P &= \text{process production (see Condition 5.1)} \end{aligned}$$

- 4.2. **Emission Factors** The permittee must use the default emission factors provided in Condition 10.0 for calculating pollutant emissions, unless alternative emission factors are approved by the Department. The permittee may request or the Department may require using alternative emission factors provided they are based on actual test

data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by the Department.

**4.3. Mass Balance
without controls**

Annual VOC emissions from the binders for each 12 consecutive calendar month period are calculated by the following formula:

$$E_{\text{VOC-A}} = \frac{[\sum(C_X * D_X * K_X) - W] \times 1 \text{ ton/2000}}{\text{pounds}}$$

Where,

$E_{\text{VOC-A}}$	=	Annual VOC emissions in tons
C	=	Material usage for the period in gallons
D	=	Material density in pounds per gallon
K	=	VOC concentration expressed as a decimal
X	=	Subscript X represents a specific material
W	=	Weight of VOC shipped offsite

**4.4. Total VOC
Emissions**

To arrive at total VOC emissions, the permittee must add the results from calculations required in Conditions 4.1 and 4.3.

5.0 RECORDKEEPING REQUIREMENTS

**5.1. Operation and
Maintenance**

The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices on a monthly basis:

- a. Tons Al poured in the operating furnaces;
- b. Tons Al melted;
- c. Tons Al chips melted;
- d. Tons Al processed in the machining section;
- e. Hours of operation of the bead blaster;
- f. Hours of operation of the shot peen blaster;
- g. Gallons of material used in mold making (Pep Set I, II, & 3500);
- h. Tons molds poured;
- i. Natural gas usage, in MMCF.

5.2. Excess Emissions

The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by

process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by the Department in accordance with OAR 340-214-0330(4).

5.3. Complaint Log

The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

5.4. Retention of Records

Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to the Department upon request.

6.0 REPORTING REQUIREMENTS

6.1. Excess Emissions

The permittee must notify the Department by telephone or in person of any excess emissions which are of a nature that could endanger public health.

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 7.4.
- b. If the excess emissions occur during non-business hours, the permittee must notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
- c. The permittee must also submit follow-up reports when required by the Department.

6.2. Annual Report

For each year this permit is in effect, the permittee must submit to the Department by **February 15** two (2) copies of the following information for the previous calendar year:

- a. Operating parameters:
 - i. Tons Al poured
 - ii. Tons Al scrap melted

- iii. Tons Al chips melted
- iv. Tons Al parts machined
- v. Hours of operation of the bead blaster and shot peen blaster, listed separately
- vi. Natural gas usage, in MMCF
- vii. Binder (Pep Set) used, by type, in gallons
- viii. Molds poured, in tons of material
- b. A summary of annual pollutant emissions determined each month in accordance with Condition 4.0, and a total of each pollutant emitted during the year.
- c. Records of all planned and unplanned excess emissions events.
- d. Summary of complaints relating to air quality received by permittee during the year.
- e. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
- f. List major maintenance performed on pollution control equipment.

6.3. Relocation Notice

The permittee must not install or operate the facility or any portion of the facility at any new site without first providing written notice to the Permit Coordinator in the appropriate regional office. The written notice must include the date of the proposed move, approximate dates of operation, a detailed map showing access to the new site, and a description of the air pollution controls and procedures to be installed, operated, and practiced at the new site. Additional permits may be required if the permittee operates individual components of the facility at more than one site at a time.

6.4. Notice of Change of Ownership or Company Name

The permittee must notify the Department in writing using a Departmental "Permit Application Form" within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

- 6.5. Construction or Modification Notices** The permittee must notify the Department in writing using a Departmental "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
 - b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
 - c. Constructing or modifying any air pollution control equipment.
- 6.6. Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in Condition 7.3.

7.0 ADMINISTRATIVE REQUIREMENTS

- 7.1. Permit Renewal Application** The completed application package for renewal of this permit is due on <enter the first of the month date>. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in condition 7.3
- 7.2. Permit Modifications** Application for a modification of this permit must be submitted not less than 60 days prior to the source modification. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the Business Office of the Department.
- 7.3. Permit Coordinator Addresses** All reports, notices, and applications should be directed to the Permit Coordinator for the area where the source is located. The Permit Coordinator addresses are as follows:

Department of Environmental Quality
Northwest Region
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
Telephone: (503) 229-5582

**7.4. Department
Contacts**

Information about air quality permits and the Department's regulations may be obtained from the DEQ web page at www.deq.state.or.us. All inquiries about this permit should be directed to the regional office for the area where the source is located. The Department's regional offices are as follows:

Department of Environmental Quality
Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
Telephone: (503) 229-5554

FEES

**8.1. Annual
Compliance Fee**

The Annual Fee specified in OAR 340-216-0020, Table 2, Part 2 for a Simple ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by Department regulations, will be mailed prior to the above date.

**8.2. Change of
Ownership or
Company Name
Fee**

The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company.

**8.3. Special Activity
Fees**

The special activity fees specified in OAR 340-216-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit.

**8.4. Where to Submit
Fees**

Fees must be submitted to:

Department of Environmental Quality
Business Office
811 SW Sixth Avenue
Portland, Oregon 97204-1390

9.0 GENERAL CONDITIONS AND DISCLAIMERS

**9.1. Permitted
Activities**

This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, or is revoked.

- 9.2. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by the Department.
- 9.3. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 9.4. Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 9.5. Department Access** The permittee must allow the Department's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 9.6. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 9.7. Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340 Division 264.
- 9.8. Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 9.9. Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 9.10. Termination, Revocation, or Modification** The Department may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

10.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF reference
Op. Furnace (Al poured)	PM	0.416	Lb/ton	Source test
Al Scrap Melted		1.53	Lb/ton	Source test
Al Chips Melted		1.30	Lb/ton	AP-42, 12.8-2
Machining Al		0.10	Lb/ton	Source test
Process Fugitives (tons Al poured)		2.54	Lb/ton	Source test
Bead Blaster		0.17	Lb/hour	0.01 gr/dscf
Shot Peen Blaster		0.30	Lb/hour	0.01 gr/dscf
Natural Gas Usage		2.50	Lb/MMCF	DEQ
Op. Furnace (Al poured)	PM ₁₀	0.025	Lb/ton	Source test
Al Scrap Melted		0.918	Lb/ton	Source test
Al Chips Melted		0.78	Lb/ton	AP-42, 12.8-2
Machining Al		0.00043	Lb/ton	Source test
Process Fugitives		1.52	Lb/ton	Source test
Bead Blaster		0.17	Lb/hour	0.01 gr/dscf
Shot Peen Blaster		0.30	Lb/hour	0.01 gr/dscf
Natural Gas Usage		2.50	Lb/MMCF	DEQ
Al Scrap Melted	VOC	0.2	Lb/ton	EPA
Al Chips Melted		0.2	Lb/ton	EPA
Natural Gas Usage		5.3	Lb/MMCF	DEQ
Mold Making (Pep Set I 1600)		2.3	Lb/gal	MSDS
Mold Making (Pep Set II 2600)		2.5	Lb/gal	MSDS
Mold Making (Pep Set 3500)		6.3	Lb/gal	MSDS
Mold Pouring		2.6	Lb/ton	EPA
Natural gas usage		100.0	Lb/MMCF	DEQ
	CO	20.0	Lb/MMCF	DEQ

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
Al	Aluminum	O ₂	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31st	O&M	operation and maintenance
CFR	Code of Federal Regulations	Pb	lead
CO	carbon monoxide	PCD	pollution control device
DEQ	Oregon Department of Environmental Quality	PM	particulate matter
dscf	dry standard cubic foot	PM ₁₀	particulate matter less than 10 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
gal	gallon(s)	PSD	Prevention of Significant Deterioration
gr/dscf	grains per dry standard cubic foot	PSEL	Plant Site Emission Limit
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	PTE	Potential to Emit
I&M	inspection and maintenance	RACT	Reasonably Available Control Technology
lb	pound(s)	scf	standard cubic foot
MMBtu	million British thermal units	SER	Significant Emission Rate
NA	not applicable	SIC	Standard Industrial Code
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SIP	State Implementation Plan
NO _x	nitrogen oxides	SO ₂	sulfur dioxide
NSPS	New Source Performance Standard	Special Control Area	as defined in OAR 340-204-0070
		VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

Department of Environmental Quality
 Northwest Region
 Air Quality Program

**STANDARD
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Consolidated Metco, Inc.
 13940 N. Rivergate Blvd.
 Portland, OR 97203
 (503) 240-5493

Source Test	Compl Sched	Report				Excess		NSR	FCE	RACT	NSPS	NESHAP	Size	Public Notice
		A	S	Q	M	R	N							
		x					x		N				ST	III

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PERMITTING

PERMITTING ACTION

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on 03/30/98 and was originally scheduled to expire on 06/01/00. The old ACDP is being converted to a Standard ACDP in accordance with the rules adopted in May 2001.

OTHER PERMITS

2. Other permits issued or required by the Department of Environmental Quality for this source include a general storm water discharge permit, 1200Z.

ATTAINMENT STATUS

3. The source is located in a maintenance area for CO and Ozone, of which NO_x and VOC are precursors. The area is in attainment for all other pollutants. The facility is an insignificant source of NO_x, VOC, and CO from natural gas combustion. The pollutant of concern at this facility is PM.

SOURCE DESCRIPTION

OVERVIEW

4. The permittee operates a secondary aluminum foundry that produces permanent mold castings for the manufacture of custom aluminum castings. Current operations at this site include the melting and holding of clean aluminum, casting, heat treatment, machining, and assembly. Raw materials used in the process include molten aluminum, aluminum ingots, reclaimed aluminum chips, and clean scrap aluminum. The various forms of aluminum are melted and/or held in natural gas fired operating furnaces. Operating furnaces require periodic fluxing for cleaning purposes.

Permanent steel molds, shell cores, and sand molds are used to produce the castings. The steel molds and some castings are processed utilizing a glass bead-blast and/or shot blaster with baghouse. The steel molds are coated with a releasing agent consisting of mica, talc, and sodium silicate solution. The no-bake sand molds have a binder chemical mixed with silica sand. Castings are heat-treated in gas and electric-fired furnaces that include a water quenching operation. Of the castings produced, 35% are machined using water-soluble oil as a machining lubricant. Some assembly operations are required prior to shipping. Wastewater generated at the facility is processed through a natural gas-fired evaporator system. The facility began operation in 1964. It operates 8760 hours/year.

5. Several pieces of equipment were added to the facility in 1999:

Equip. ID	Description	Rated Capacity
S-H9	Natural gas fired drop bottom heat treating furnace	6 MM Btu/hr
S-H13	Natural gas fired drop bottom heat treating furnace	6 MM Btu/hr
S-H14	Natural gas fired drop bottom heat treating furnace	6 MM Btu/hr
S-F16 & 17	Natural gas fired operating furnace	6 MM Btu/hr each
S-F15	Operating furnace	3 MM Btu/hr
S-H10	Shot-peen blaster and baghouse	3,500 cfm @ 70° F
S-H11a & b	Backup gas fired hot metal crucible heaters	0.168 MM Btu/hr each
S-H12a & b	Barrel heaters with gas fired heaters	0.02 MM Btu/hr each
S-H15	Natural gas fired quench tank	0.0065 MM Btu/hr

PROCESS AND CONTROL DEVICES

6. Air contaminant sources at the facility consist of the following:

Qty	Process Equipment	Qty	Process Equipment
17	Operating furnaces	2	Backup crucible heaters
4	Scrap melting furnaces	2	Barrel heaters
4	Heat treating furnaces	2	Heated parts washers
2	Aging furnaces	3	Mold making stations
2	Aluminum pour operations	1	Machining station
2	Quench tanks	1	Bead blaster with baghouse
1	Chip cyclone dryer	1	Chip grinder & melting furnace w/baghouse

COMPLIANCE

- The facility will be inspected by Department personnel to ensure compliance with the permit conditions.
- The facility was inspected in June 1989, July 1994, February 2000, and June 2003 and was found to be in compliance with permit conditions.
- During the prior permit period, one complaint regarding the burning of cutting fluids for oil at the facility was received. The complaint was not substantiated.
- No enforcement actions have been taken against this source since the last permit renewal.
- This facility is not subject to a Full Compliance Evaluation as it is defined in Oregon's partnership agreement with the US EPA.

SPECIAL CONDITIONS

12. The permittee is required to store the dross inside the building until it is disposed or sold for recycling.

EMISSIONS

13. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	20	20	20	40	44	4
PM ₁₀	12	12	12	24	26	2
SO ₂	n/a	n/a	n/a	n/a	n/a	n/a
NO _x	7	7	7	24	46	22
CO	1	1	1	5	99	94
VOC	-1	-1	n/a	12	39	27

- The proposed PSELs for all pollutants are equal to the Generic PSEL plus the Netting Basis, except SO₂.
- SO₂ emissions are estimated to be 0.6 ton/year and are not included in the PSEL.
- Emissions calculations, based on a work year of 8760 hours, are attached.
- The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

14. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.

MAJOR SOURCE APPLICABILITY

CRITERIA POLLUTANTS

15. A major source is a facility that has the potential to emit more than 100 tons per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions. The facility operates 24 hours a day, 7 days a week, thus the estimated actual emissions (attached) represent PTE.

HAZARDOUS AIR POLLUTANTS

16. A major source is a facility that has the potential to emit more than 10 tons/year of any single HAP or 25 tons/year of combined HAPs. This facility is not a major source of hazardous air pollutants. Hydrogen fluoride and hydrogen chloride are estimated at less than one ton per year each.

ADDITIONAL REQUIREMENTS

NSPS APPLICABILITY

17. There are no sources at this facility for which NSPS standards have been promulgated.

NESHAPS/MACT APPLICABILITY

18. 40 CFR Part 63, Subpart RRR, Secondary Aluminum Processing, is not applicable to the source per a determination by the US EPA dated 3/5/04.

RACT APPLICABILITY

19. The facility is located in the Portland AQMA, but it is not one of the listed source categories in OAR 340-232-0010, thus the RACT rules do not apply

TACT APPLICABILITY

20. The source is meeting the states TACT/Highest and Best Rules by the use of baghouses on the processes that can be controlled (bead blaster and chip grinder).

SOURCE TESTING

PRIOR TESTING RESULTS

21. Stack tests were conducted on Operating Furnace SF-5 and Scrap Melting Furnace SF-6. At the same time, ambient air monitoring devices were placed near the roof fans to approximate fugitive emissions from the various operations at the facility. The monitored value was for dry (front-half catch) PM.

Emission Device	Test Date	Type of Production	Pollutant	Measured Value
SF-5 Furnace	July 1994	Fluxing	PM	0.416 lb/ton
		Pouring	PM	0.416 lb/ton
SF-6 Furnace	July 1994	Melting	PM	1.53 lb/ton
Fugitives	July 1994	All processes	Front half PM	1.68 lb/ton
Fugitives	July 1994	All processes	Back half PM	2.54 lb/ton

PUBLIC NOTICE

22. Pursuant to OAR 340-216-0064(5)(b), renewals of Standard Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b). Therefore, the proposed permit was placed on public notice from July 1 to August 2, 2004. No comments were received from the public. Several typographical errors were corrected after the public notice period.

kka:ed
8/5/2004

Particulate Matter	Production		TSP EF	Units	Reference	TSP (T/yr)		PM10 EF	Units	Reference	PM10 (T/yr)
	Rate	Units									
Op. furnace Al poured	24,300	tons/yr	0.416	lb/ton	Test 7/94	5.05		0.25	lb/ton	test 7/94	3.04
Al scrap melted	8,019	tons/yr	1.53	lb/ton	Test 7/94	6.13		0.918	lb/ton	test 7/94	3.68
Al chips melted	1,215	tons/yr	1.3	lb/ton	AP-42	0.79		0.78	lb/ton	AP-42	0.47
Machining Al	8,505	tons/yr	0.1	lb/ton	Test 7/94	0.43		4.30E-03	lb/ton	test 7/94	0.02
Process Fugitives	24,300	tons/yr	2.54	lb/ton	Test 7/94	30.86		1.52	lb/ton	test 7/94	18.47
Bead Blaster	700	hours/yr	0.17	lb/hr	0.01 gr/dscf	0.06		0.17	lb/hr	0.01 gr/dscf	0.06
Natural Gas Usage	500	MMCF/yr	2.5	lb/MMCF	AP-42	0.63		2.5	lb/MMCF	AP-42	0.63
					Totals	43.9					26.4
Natural Gas Usage			NOx EF	Units	Reference	NOx (T/yr)		CO EF	Units	Reference	CO (T/yr)
gaseous pollutants											
	500	MMCF/yr	100	lb/MMCF	DEQ	25		20	lb/MMCF	DEQ	5
			SO2 EF	Units	Reference	SO2 (T/y)		VOC EF	Units	Reference	VOC (T/yr)
			2.6	lb/MMCF	DEQ	0.7		5.3	lb/MMCF	DEQ	1.33
Other VOC Sources											
Al scrap melted	8,019	tons/yr						0.2	lb/ton	EPA	0.80
Al chips melted	1,215	tons/yr						0.2	lb/ton	EPA	0.12
Mold making (Pep Set 1)	4,653	gal/yr						2.3	lb/gal	MSDS	5.35
Molds, Pep Set II	4,653	gal/yr						2.5	lb/gal	MSDS	5.82
Molds, Pep Set 3500	389	gal/yr						6.3	lb/gal	MSDS	1.23
Mold pouring	243	tons/yr						2.6	lb/ton	EPA	0.32
					Total VOC						15.0

	Production		TSP EF	Units	Reference	TSP (T/yr)		PM10 EF	Units	Reference	PM10 (T/yr)
Particulate Matter	Rate	Units									
Op. furnace Al poured	7,955	tons/yr	0.416	lb/ton	Test 7/94	1.65		0.25	lb/ton	test 7/94	0.99
Al scrap melted	677	tons/yr	1.53	lb/ton	Test 7/94	0.52		0.918	lb/ton	test 7/94	0.31
Al chips melted	398	tons/yr	1.3	lb/ton	AP-42	0.26		0.78	lb/ton	AP-42	0.16
Machining Al	2,784	tons/yr	0.1	lb/ton	Test 7/94	0.14		4.30E-03	lb/ton	test 7/94	0.01
Process Fugitives	7,955	tons/yr	2.54	lb/ton	Test 7/94	10.10		1.52	lb/ton	test 7/94	6.05
Bead Blaster	529	hours/yr	0.17	lb/hr	0.01 gr/dscf	0.04		0.17	lb/hr	0.01 gr/dscf	0.04
Natural Gas Usage	139	MMCF/yr	2.5	lb/MMCF	AP-42	0.17		2.5	lb/MMCF	AP-42	0.17
					Totals	12.9					7.7
Natural Gas Usage			NOx EF	Units	Reference	NOx (T/yr)		CO EF	Units	Reference	CO (T/yr)
gaseous pollutants											
	139	MMCF/yr	100	lb/MMCF	DEQ	6.95		20	lb/MMCF	DEQ	1.39
			SO2 EF	Units	Reference	SO2 (T/y)		VOC EF	Units	Reference	VOC (T/yr)
			2.6	lb/MMCF	DEQ	0.2		5.3	lb/MMCF	DEQ	0.37
Other VOC Sources											
Al scrap melted	677	tons/yr						0.2	lb/ton	EPA	0.07
Al chips melted	398	tons/yr						0.2	lb/ton	EPA	0.04
Mold making (Pep Set 1)	1,511	gal/yr						2.3	lb/gal	MSDS	1.74
Molds, Pep Set II	1,511	gal/yr						2.5	lb/gal	MSDS	1.89
Molds, Pep Set 3500	127	gal/yr						6.3	lb/gal	MSDS	0.40
Mold pouring	80	tons/yr						2.6	lb/ton	EPA	0.10
					Total VOC						4.6



P.O. Box 301007 • Portland, OR 97294-9007 • (503) 255-6655 • FAX (503) 255-6968
P.O. Box 5492 • Kent, WA 98064 • (206) 630-8422 • FAX (206) 630-0711

July 26, 1996

Ernie Nimister, Environmental Manager
James Garver, Maintenance Manager
CONSOLIDATED METCO, INC.
PO Box 83201
Portland, Or. 97283-0201

Dear Gentlemen:

On July 20, 1996 Serbaco, Inc installed 174 nine and one half spun polyester bags in the Bead Blast collector. The collector was flow rated on July 25, 1996. The results are included with this letter. At the time of the flow rating the differential pressure across the bags was 2.2 inches of water.

The bags are 5 inches in diameter by 50 inches long. The effective filter area for the collector is 950 ft² of cloth. The measured flow rate is 6017 cfm. The air to cloth ratio is 6.3 per square ft cloth area.

Thank you for the opportunity to serve Consolidated Metco's air pollution control needs. If we can be of further assistance or you have questions regarding our report, please call.

Sincerely,

A handwritten signature in cursive script that reads "Jon C. Anderson".

Jon C. Anderson, Field Service Manager/Engineer

JCA/ss

FLOW RATE TEST RESULTS
Twenty Point Duct Traverse

JOB SITE: CONSOLIDATED METCO, INC.

13940 N. RIVERGATE BLVD. PORTLAND, OREGON

STATION: BEAD BLAST BAGHOUSE

BAROMET 29.96 in.Hg.

TEST DATE: JULY 25, 1996

TIME: 10:00 AM

STATIC P: -8.3 in.WC

FILE: 20PTFLO2

TESTER: CN

WET BULB: 84 Degree F

DRY BULB: 96 Degree F

DUCT DIAM: 20 inches

CHART DE 14.6 CuFt/lb.

DUCT AREA: 2.182 Square feet

(Humid Vol) Dry Air

LOCATION	VP	VP SQR
1	0.25	0.5
2	0.30	0.547723
3	0.30	0.547723
4	0.30	0.547723
5	0.35	0.591608
6	0.45	0.67082
7	0.52	0.72111
8	0.65	0.806226
9	0.70	0.83666
10	0.60	0.774597
11	0.30	0.547723
12	0.40	0.632456
13	0.44	0.663325
14	0.38	0.616441
15	0.40	0.632456
16	0.42	0.648074
17	0.53	0.728011
18	0.50	0.707107
19	0.46	0.678233
20	0.42	0.648074

0.652304 Average Sq.Root of Velocity Pressure

HV	14.60	CF/lb.DA
VP	0.425501	in. WC
DCF	0.980954	Dens.fact
CD	0.067189	

AVERAGE VELOCITY 2758 fpm

VOLUMETRIC FLOW RATE = 6017 CFM

SERBACO, INC

(503) 255-6655

PORTLAND, OR

(206) 630-8422

SEATTLE, WA

January 13, 2006

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7003 2260 0001 3392 09471**

Ms. Kathy Amidon, Permit Coordinator
Department of Environmental Quality
Northwest Region
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

**RE: Air Contaminant Discharge Permit No. 26-1890 Reporting Requirements
Consolidated Metco, Inc.
Portland, Multnomah County, Oregon**

Dear Ms. Amidon:

In accordance with the annual reporting requirements of our Air Contaminant Discharge Permit (ACDP) No. 26-1890, Annual Reporting Requirements 6.2, we submit the following:

6.2(a) Operating Parameters:

- (i) *Tons of aluminum poured* = 10,638.1 Tons in calendar year 2005
- (ii) *Tons of aluminum scrap melted* = 3,191.2 Tons in calendar year 2005
- (iii) *Tons of aluminum chips melted* = 1,046.9 Tons in calendar year 2005
- (iv) *Tons of aluminum parts machined* = 3,723.4 Tons in calendar year 2005
- (v) *Hours of operation of the bead blaster and shot peen blaster, listed separately:*
 - Bead Blaster = 42.2 hours in calendar year 2005
 - Shot Peen Blaster = 1,084.6 hours in calendar year 2005
- (vi) *Natural gas usage, in MMCF* = 154.6 MMCF in calendar year 2005
- (vii) *Binder (Pep Set) used, by type, in gallons* = None in 2005
- (viii) *Molds poured, in tons of material* = None in 2005

Reference Appendix A, CALENDAR YEAR 2005 THROUGHPUT SUMMARY.

6.2(b) A summary of annual pollutant emissions determined each month in accordance with Condition 4.0, and a total of each pollutant emitted during the year.

Pollutant	Limit	Units	2005 Annual Emissions
PM	44	Tons per year	19.39
PM ₁₀	26	Tons per year	10.45
NO _x	46	Tons per year	7.73
CO	99	Tons per year	1.55
VOC	39	Tons per year	.83

Department of Environmental Quality
January 13, 2006
Page 2

Reference Appendix B, CY 2005 EMISSIONS and Appendix C, 12-MONTH ROLLING EMISSIONS.

6.2(c) Records of planned and unplanned excess emissions events.

There were no planned or unplanned excess emission events in year 2005.

6.2(d) Summary of complaints relating to air quality received by permittee during the year.

There were no complaints relating to air quality issues in year 2005.

6.2(e) List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.

Our production output for the year 2005 decreased by 10.9% from the previous year.

6.2(f) List major maintenance performed on all pollution equipment.

The baghouse filters were changed in March, July and November 2005. There was no additional major maintenance performed on our air pollution equipment in year 2005.

We are submitting one original and two copies of our report.

If you should have any questions regarding the information contained in this report, please give me a call at 503/240-5493.

Sincerely,

CONSOLIDATED METCO, INC.



Ernie Nimister
Manager of Environmental Compliance and Safety

Attachments

cc: *Tom Duncan, CMI*
Bob Lowe, CMI

APPENDIX A

CALENDAR YEAR 2005 THROUGHPUT SUMMARY

CALENDAR YEAR 2005 THROUGHPUT SUMMARY

[illegible]

APPENDIX B

CY 2005 EMISSIONS

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

CY 2005 EMISSIONS

Yr.	Month	MONTHLY EMISSIONS (tons)					ROLLING 12-MONTH EMISSIONS (tons)				
		PM	PM10	VOC	NOx	CO	PM	PM10	VOC	NOx	CO
2005	January	2.03	1.10	0.10	0.83	0.17	12.16	6.55	0.52	4.64	0.93
	February	1.79	0.96	0.08	0.73	0.15	13.95	7.51	0.59	5.38	1.08
	March	2.59	1.38	0.09	0.75	0.15	16.54	8.89	0.69	6.12	1.22
	April	1.18	0.64	0.06	0.55	0.11	17.72	9.53	0.74	6.67	1.33
	May	1.44	0.77	0.06	0.68	0.14	19.16	10.30	0.80	7.36	1.47
	June	1.53	0.83	0.07	0.68	0.14	20.69	11.13	0.88	8.04	1.61
	July	1.21	0.65	0.06	0.57	0.11	21.90	11.79	0.94	8.61	1.72
	August	1.77	0.95	0.07	0.62	0.12	21.68	11.68	0.93	8.50	1.70
	September	1.57	0.84	0.06	0.56	0.11	21.36	11.51	0.91	8.31	1.66
	October	1.70	0.91	0.07	0.63	0.13	20.87	11.24	0.89	8.16	1.63
	November	1.38	0.75	0.06	0.57	0.11	20.09	10.83	0.86	7.94	1.59
	December	1.21	0.66	0.06	0.56	0.11	19.39	10.45	0.83	7.73	1.55

Calendar Year 2005 Summary:	PM	PM-10	VOC	NOx	CO
Emissions in tons	19.39	10.45	0.83	7.73	1.55

APPENDIX C

12-MONTH ROLLING EMISSIONS

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

12-MONTH ROLLING EMISSIONS

Yr.	Month	MONTHLY EMISSIONS (tons)					ROLLING 12-MONTH EMISSIONS (tons)				
		PM	PM10	VOC	NOx	CO	PM	PM10	VOC	NOx	CO
2004	August	1.99	1.06	0.07	0.72	0.14					
	September	1.89	1.02	0.08	0.74	0.15	3.88	2.08	0.15	1.47	0.29
	October	2.18	1.18	0.09	0.78	0.16	6.06	3.25	0.24	2.25	0.45
	November	2.17	1.17	0.09	0.80	0.16	8.23	4.42	0.34	3.04	0.61
	December	1.91	1.03	0.09	0.77	0.15	10.13	5.45	0.42	3.81	0.76
2005	January	2.03	1.10	0.10	0.83	0.17	12.16	6.55	0.52	4.64	0.93
	February	1.79	0.96	0.08	0.73	0.15	13.95	7.51	0.59	5.38	1.08
	March	2.59	1.38	0.09	0.75	0.15	16.54	8.89	0.69	6.12	1.22
	April	1.18	0.64	0.06	0.55	0.11	17.72	9.53	0.74	6.67	1.33
	May	1.44	0.77	0.06	0.68	0.14	19.16	10.30	0.80	7.36	1.47
	June	1.53	0.83	0.07	0.68	0.14	20.69	11.13	0.88	8.04	1.61
	July	1.21	0.65	0.06	0.57	0.11	21.90	11.79	0.94	8.61	1.72
	August	1.77	0.95	0.07	0.62	0.12	21.68	11.68	0.93	8.50	1.70
	September	1.57	0.84	0.06	0.56	0.11	21.36	11.51	0.91	8.31	1.66
	October	1.70	0.91	0.07	0.63	0.13	20.87	11.24	0.89	8.16	1.63
	November	1.38	0.75	0.06	0.57	0.11	20.09	10.83	0.86	7.94	1.59
	December	1.21	0.66	0.06	0.56	0.11	19.39	10.45	0.83	7.73	1.55

Permit Limits, in tons per year for any 12-consecutive month period:	PM	PM-10	VOC	NOx	CO
	44	26	39	46	99



CONSOLIDATED METCO, INC.

January 29, 2007

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0002 1718 9373**

Ms. Catherine Blaine, Permit Coordinator
Department of Environmental Quality
Northwest Region – Air Quality Division
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

**RE: Air Contaminant Discharge Permit No. 26-1890 Reporting Requirements
Consolidated Metco, Inc.
Portland, Multnomah County, Oregon**

Dear Ms. Blaine:

In accordance with the annual reporting requirements of our Air Contaminant Discharge Permit (ACDP) No. 26-1890, Annual Reporting Requirements 6.2, we submit the following:

6.2(a) Operating Parameters:

- (i) *Tons of aluminum poured* = 9,178 Tons in calendar year 2006
- (ii) *Tons of aluminum scrap melted* = 2,753.4 Tons in calendar year 2006
- (iii) *Tons of aluminum chips melted* = 1,209.5 Tons in calendar year 2006
- (iv) *Tons of aluminum parts machined* = 3,212.3 Tons in calendar year 2006
- (v) *Hours of operation of the bead blaster and shot peen blaster, listed separately:*
 - Bead Blaster = 51.8 hours in calendar year 2006
 - Shot Peen Blaster = 1237.4 hours in calendar year 2006
- (vi) *Natural gas usage, in MMCF* = 123.5 MMCF in calendar year 2006
- (vii) *Binder (Pep Set) used, by type, in gallons* = None in 2006
- (viii) *Molds poured, in tons of material* = None in 2006

Reference Appendix A, CALENDAR YEAR 2006 THROUGHPUT SUMMARY.

6.2(b) A summary of annual pollutant emissions determined each month in accordance with Condition 4.0, and a total of each pollutant emitted during the year.

Pollutant	Limit	Units	2006 Annual Emissions
PM	44	Tons per year	16.96
PM ₁₀	26	Tons per year	9.17
NO _x	46	Tons per year	6.17
CO	99	Tons per year	1.23
VOC	39	Tons per year	.72

Ms. Catherine Blaine, Permit Coordinator
January 29, 2007
Page 2

Reference Appendix B, CY 2006 EMISSIONS and Appendix C, 12-MONTH ROLLING EMISSIONS.

6.2(c) Records of planned and unplanned excess emissions events.

There were no planned or unplanned excess emission events in year 2006.

6.2(d) Summary of complaints relating to air quality received by permittee during the year.

There were no complaints relating to air quality issues in year 2006.

6.2(e) List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.

Our production ratio or activity index for the year 2006 is 0.86 from the previous year.

6.2(f) List major maintenance performed on all pollution equipment.

There was no major maintenance performed on our air pollution equipment in year 2006.

We are submitting one original and two copies of our report.

If you should have any questions regarding the information contained in this report, please give me a call at 503/240-5493.

Sincerely,

CONSOLIDATED METCO, INC.



Ernie Nimister
Manager of Environmental Compliance and Safety

Attachments

cc: *Tom Duncan, CMI*
Bruce Post, CMI

APPENDIX A

CALENDAR YEAR 2006 THROUGHPUT SUMMARY

**CONSOLIDATED METCO, INC. - RIVERGATE PLANT
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

THROUGHPUT SUMMARY CY 2006

[illegible]

APPENDIX B

CY 2006 EMISSIONS

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

CY 2006 EMISSIONS

Yr.	Month	MONTHLY EMISSIONS (tons)					ROLLING 12-MONTH EMISSIONS (tons)				
		PM	PM10	VOC	NOx	CO	PM	PM10	VOC	NOx	CO
2006	January	1.42	0.77	0.06	0.57	0.11	9.94	5.36	0.42	3.96	0.79
	February	1.44	0.77	0.06	0.52	0.10	9.59	5.17	0.41	3.75	0.75
	March	1.60	0.87	0.07	0.55	0.11	8.60	4.65	0.38	3.55	0.71
	April	1.39	0.75	0.06	0.51	0.10	8.81	4.76	0.38	3.51	0.70
	May	1.54	0.84	0.06	0.53	0.11	8.91	4.82	0.38	3.36	0.67
	June	1.43	0.77	0.06	0.51	0.10	8.82	4.77	0.37	3.19	0.64
	July	1.33	0.72	0.06	0.50	0.10	10.15	5.49	0.43	3.68	0.74
	August	1.56	0.84	0.07	0.54	0.11	11.71	6.33	0.49	4.22	0.84
	September	1.37	0.74	0.06	0.50	0.10	13.08	7.07	0.56	4.71	0.94
	October	1.51	0.81	0.06	0.55	0.11	14.59	7.89	0.62	5.26	1.05
	November	1.36	0.74	0.06	0.51	0.10	15.95	8.62	0.68	5.76	1.15
	December	1.01	0.55	0.05	0.41	0.08	16.96	9.17	0.72	6.17	1.23

Calendar Year 2006 Summary:	PM	PM-10	VOC	NOx	CO
Emissions in tons	16.96	9.17	0.72	6.17	1.23

APPENDIX C

12-MONTH ROLLING EMISSIONS

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

12-MONTH ROLLING EMISSIONS

Yr.	Month	MONTHLY EMISSIONS (tons)					ROLLING 12-MONTH EMISSIONS (tons)				
		PM	PM10	VOC	NOx	CO	PM	PM10	VOC	NOx	CO
2006	January	1.42	0.77	0.06	0.57	0.11	9.94	5.36	0.42	3.96	0.79
	February	1.44	0.77	0.06	0.52	0.10	9.59	5.17	0.41	3.75	0.75
	March	1.60	0.87	0.07	0.55	0.11	8.60	4.65	0.38	3.55	0.71
	April	1.39	0.75	0.06	0.51	0.10	8.81	4.76	0.38	3.51	0.70
	May	1.54	0.84	0.06	0.53	0.11	8.91	4.82	0.38	3.36	0.67
	June	1.43	0.77	0.06	0.51	0.10	8.82	4.77	0.37	3.19	0.64
	July	1.33	0.72	0.06	0.50	0.10	10.15	5.49	0.43	3.68	0.74
	August	1.56	0.84	0.07	0.54	0.11	11.71	6.33	0.49	4.22	0.84
	September	1.37	0.74	0.06	0.50	0.10	13.08	7.07	0.56	4.71	0.94
	October	1.51	0.81	0.06	0.55	0.11	14.59	7.89	0.62	5.26	1.05
	November	1.36	0.74	0.06	0.51	0.10	15.95	8.62	0.68	5.76	1.15
	December	1.01	0.55	0.05	0.41	0.08	16.96	9.17	0.72	6.17	1.23
2007	January	0.00	0.00	0.00	0.00	0.00	15.55	8.40	0.66	5.61	1.12
	February	0.00	0.00	0.00	0.00	0.00	14.11	7.63	0.60	5.09	1.02
	March	0.00	0.00	0.00	0.00	0.00	12.51	6.76	0.53	4.54	0.91
	April	0.00	0.00	0.00	0.00	0.00	11.12	6.01	0.48	4.03	0.81
	May	0.00	0.00	0.00	0.00	0.00	9.58	5.18	0.41	3.50	0.70
	June	0.00	0.00	0.00	0.00	0.00	8.14	4.40	0.35	2.99	0.60
	July	0.00	0.00	0.00	0.00	0.00	6.82	3.68	0.30	2.49	0.50
	August	0.00	0.00	0.00	0.00	0.00	5.25	2.84	0.23	1.96	0.39
	September	0.00	0.00	0.00	0.00	0.00	3.89	2.10	0.17	1.46	0.29
	October	0.00	0.00	0.00	0.00	0.00	2.38	1.28	0.11	0.92	0.18
	November	0.00	0.00	0.00	0.00	0.00	1.01	0.55	0.05	0.41	0.08
	December	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Permit Limits, in tons per year for any 12-consecutive month period:	PM	PM-10	VOC	NOx	CO
	44	26	39	46	99

January 23, 2008

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0002 1718 9748**

Ms. Catherine Blaine, Permit Coordinator
Department of Environmental Quality
Northwest Region – Air Quality Division
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

**RE: Air Contaminant Discharge Permit No. 26-1890 Reporting Requirements
Consolidated Metco, Inc.
Portland, Multnomah County, Oregon**

Dear Ms. Blaine:

In accordance with the annual reporting requirements of our Air Contaminant Discharge Permit (ACDP) No. 26-1890, Annual Reporting Requirements 6.2, we submit the following:

6.2(a) Operating Parameters:

- (i) *Tons of aluminum poured* = 2,271.27 Tons in calendar year 2007
- (ii) *Tons of aluminum scrap melted* = 681.38 Tons in calendar year 2007
- (iii) *Tons of aluminum chips melted* = 300.52 Tons in calendar year 2007
- (iv) *Tons of aluminum parts machined* = 794.95 Tons in calendar year 2007
- (v) *Hours of operation of the bead blaster and shot peen blaster, listed separately:*
Bead Blaster = 11.6 hours in calendar year 2007
Shot Peen Blaster = 0 hours in calendar year 2007
- (vi) *Natural gas usage, in MMCF* = 39.41 MMCF in calendar year 2007
- (vii) *Binder (Pep Set) used, by type, in gallons* = None in 2007
- (viii) *Molds poured, in tons of material* = None in 2007

Reference Appendix A, CALENDAR YEAR 2007 THROUGHPUT SUMMARY.

6.2(b) A summary of annual pollutant emissions determined each month in accordance with Condition 4.0, and a total of each pollutant emitted during the year.

Pollutant	Limit	Units	2007 Annual Emissions
PM	44	Tons per year	4.16
PM ₁₀	26	Tons per year	2.24
NO _x	46	Tons per year	1.97
CO	99	Tons per year	.39
VOC	39	Tons per year	.20

Ms. Catherine Blaine, Permit Coordinator
January 23, 2008
Page 2

Reference Appendix B, CY 2007 EMISSIONS and Appendix C, 12-MONTH ROLLING EMISSIONS.

6.2(c) Records of planned and unplanned excess emissions events.

There were no planned or unplanned excess emission events in year 2007.

6.2(d) Summary of complaints relating to air quality received by permittee during the year.

There were no complaints relating to air quality issues in year 2007.

6.2(e) List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.

Our production ratio or activity index for the year 2007 is 0.25 from the previous year. The manufacturing plant ceased operations and closed on October 5, 2007 with no plans to reopen.

6.2(f) List major maintenance performed on all pollution equipment.

There was no major maintenance performed on our air pollution equipment in year 2007.

We are submitting one original and two copies of our report.

If you should have any questions regarding the information contained in this report, please give me a call at 503/240-5493.

Sincerely,

CONSOLIDATED METCO, INC.



Ernie Nimister
Manager of Environmental Compliance and Safety

Attachments

cc: *Tom Duncan, CMI*
Bruce Post, CMI

APPENDIX A

CALENDAR YEAR 2007 THROUGHPUT SUMMARY

THROUGHPUT SUMMARY CY 2007

[illegible]

APPENDIX B

CY 2007 EMISSIONS

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

CY 2007 EMISSIONS

Yr.	Month	MONTHLY EMISSIONS (tons)					ROLLING 12-MONTH EMISSIONS (tons)				
		PM	PM10	VOC	NOx	CO	PM	PM10	VOC	NOx	CO
2007	January	1.13	0.60	0.05	0.46	0.11	16.67	9.01	0.71	6.07	1.21
	February	0.91	0.49	0.04	0.39	0.08	16.14	8.72	0.70	5.93	1.19
	March	1.10	0.59	0.05	0.44	0.09	15.64	8.44	0.68	5.82	1.16
	April	0.56	0.30	0.03	0.31	0.06	14.81	7.99	0.65	5.63	1.13
	May	0.20	0.11	0.01	0.20	0.04	13.47	7.27	0.60	5.30	1.06
	June	0.17	0.09	0.01	0.10	0.02	12.21	6.59	0.55	4.89	0.98
	July	0.09	0.05	0.01	0.07	0.01	10.98	5.92	0.50	4.46	0.89
	August	0.00	0.00	0.00	0.00	0.00	9.42	5.07	0.43	3.93	0.79
	September	0.00	0.00	0.00	0.00	0.00	8.05	4.33	0.37	3.43	0.69
	October	0.00	0.00	0.00	0.00	0.00	6.54	3.52	0.31	2.89	0.58
	November	0.00	0.00	0.00	0.00	0.00	5.18	2.78	0.25	2.38	0.48
	December	0.00	0.00	0.00	0.00	0.00	4.16	2.24	0.20	1.97	0.39

Calendar Year 2007 Summary:	PM	PM-10	VOC	NOx	CO
Emissions in tons	4.16	2.24	0.20	1.97	0.39

Permit Limits, in tons per year for any 12-consecutive month period:	PM	PM-10	VOC	NOx	CO
	44	26	39	46	99

APPENDIX C

12-MONTH ROLLING EMISSIONS

**CONSOLIDATED METCO, INC. - RIVERGATE FACILITY
AIR CONTAMINANT DISCHARGE PERMIT
TRACKING LOG**

12-MONTH ROLLING EMISSIONS

Yr.	Month	MONTHLY EMISSIONS (tons)					ROLLING 12-MONTH EMISSIONS (tons)				
		PM	PM10	VOC	NOx	CO	PM	PM10	VOC	NOx	CO
2006	January	1.42	0.77	0.06	0.57	0.11	9.94	5.36	0.42	3.96	0.79
	February	1.44	0.77	0.06	0.52	0.10	9.59	5.17	0.41	3.75	0.75
	March	1.60	0.87	0.07	0.55	0.11	8.60	4.65	0.38	3.55	0.71
	April	1.39	0.75	0.06	0.51	0.10	8.81	4.76	0.38	3.51	0.70
	May	1.54	0.84	0.06	0.53	0.11	8.91	4.82	0.38	3.36	0.67
	June	1.43	0.77	0.06	0.51	0.10	8.82	4.77	0.37	3.19	0.64
	July	1.33	0.72	0.06	0.50	0.10	10.15	5.49	0.43	3.68	0.74
	August	1.56	0.84	0.07	0.54	0.11	11.71	6.33	0.49	4.22	0.84
	September	1.37	0.74	0.06	0.50	0.10	13.08	7.07	0.56	4.71	0.94
	October	1.51	0.81	0.06	0.55	0.11	14.59	7.89	0.62	5.26	1.05
	November	1.36	0.74	0.06	0.51	0.10	15.95	8.62	0.68	5.76	1.15
	December	1.01	0.55	0.05	0.41	0.08	16.96	9.17	0.72	6.17	1.23
2007	January	1.13	0.60	0.05	0.46	0.09	16.67	9.01	0.71	6.07	1.21
	February	0.91	0.49	0.04	0.39	0.08	16.14	8.72	0.70	5.93	1.19
	March	1.10	0.59	0.05	0.44	0.09	15.64	8.44	0.68	5.82	1.16
	April	0.56	0.30	0.03	0.31	0.06	14.81	7.99	0.65	5.63	1.13
	May	0.20	0.11	0.01	0.20	0.04	13.47	7.27	0.60	5.30	1.06
	June	0.17	0.09	0.01	0.10	0.02	12.21	6.59	0.55	4.89	0.98
	July	0.09	0.05	0.01	0.07	0.01	10.98	5.92	0.50	4.46	0.89
	August	0.00	0.00	0.00	0.00	0.00	9.42	5.07	0.43	3.93	0.79
	September	0.00	0.00	0.00	0.00	0.00	8.05	4.33	0.37	3.43	0.69
	October	0.00	0.00	0.00	0.00	0.00	6.54	3.52	0.31	2.89	0.58
	November	0.00	0.00	0.00	0.00	0.00	5.18	2.78	0.25	2.38	0.48
	December	0.00	0.00	0.00	0.00	0.00	4.16	2.24	0.20	1.97	0.39

Permit Limits, in tons per year for any 12-consecutive month period:	PM	PM-10	VOC	NOx	CO
	44	26	39	46	99



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

CC: BRICE BARKER

BOB LOWE

BRUCE POST

Reply To
Attn Of: OAQ-107

05 MAR 2004

Audrey O'Brien
Air Quality Program Manager
Northwest Region
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201

Re: MACT Subpart RRR Applicability Determination (Thermal Chip Dryer)
Consolidated Metals Company (ConMetCo) Rivergate Plant

Dear Ms. O'Brien:

This letter responds to your request by email March 31, 2003, (and subsequent email requests in December, 2003), asking for a determination of whether or not the chip dryer at the facility referenced above is a thermal chip dryer according to the definition in 40 CFR § 63.1503 (MACT Subpart RRR). After reviewing the information submitted by Oregon Department of Environmental Quality (ODEQ) and the Consolidated Metals Company (ConMetCo), the amendments to MACT Subpart RRR, EPA has determined that this chip dryer is not subject to the requirements of MACT Subpart RRR.

Based on the information provided, the Rivergate Plant is an aluminum foundry that melts only clean charge and internal scrap. The amendments to the rule, published in 67 FR 79808, December 30, 2002, clarified the definitions of clean charge and internal scrap.

Clean Charge means furnace charge materials including molten aluminum, T-bar, sow, ingot, alloying elements, aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by centrifugal cleaner; aluminum scrap dried at 343 °C (650 °F) or higher; aluminum scrap delacquered/decoated at 482 °C (900 °F) or higher, and runaround scrap. The plant melts clean ingots and scrap/recycled material.

Internal scrap is defined as all aluminum scrap regardless of the level of contamination which originates from castings or extrusions produced by an aluminum die casting facility, aluminum foundry, or aluminum extrusion facility, and which remains at all times within the control of the company that produced the castings or extrusions. The scrap/recycled material melted at the Rivergate Plant consists of machining material that comes from one of two sources, either the Rivergate facility itself, or from ConMetCo's Clackamas Plant (also owned and operated by ConMetCo). Based on this information, the Rivergate facility satisfies one of the criteria for not being a secondary aluminum production facility (SAPF).

The second criterion is that the facility must not operate a sweat furnace, thermal chip dryer, or scrap dryer/delacquering kiln/decoating kiln. The ConMetCo Rivergate Plant has no sweat furnaces and no scrap dryer/delacquering kiln/decoating kilns. It does operate a dryer. The amended rule also clarified the definition of thermal chip dryers. *Thermal chip dryer* means a device that uses heat to evaporate oil or oil/water mixtures from unpainted/uncoated aluminum chips. Pre-heating boxes or other dryers which are used solely to remove water from aluminum scrap are not considered to be thermal chip dryers for the purposes of this subpart. (40 CFR § 63.1503)

After reviewing the information submitted by the facility, it appears that the dryer is not a thermal chip dryer according to 40 CFR § 63.1503. The Rivergate Plant uses a centrifuge to remove oil from the chips. The facility indicated that subsequent heating of the chips is done solely for removal of moisture, which is described as a safety concern. After the centrifuge, the chips are fed through a hot cyclone where the chips are indirectly heated by waste heat from a charging furnace afterburner. As a result of the indirect heat, the chip surface temperature typically reaches 100 to 150 degrees F. Since the facility utilizes a centrifuge to first remove oils from the chips, and the subsequent indirect heating of the chips results in relatively low temperatures, EPA believes that the purpose of the dryer is to remove water.

Therefore, for the reasons presented above, EPA has determined that the dryer is not a thermal chip dryer, and thus not subject to the requirements of MACT Subpart RRR. This determination has been coordinated with EPA's Office of Enforcement and Compliance Assurance. If you have any questions, please contact Madonna Narvaez at 206-553-2117, or electronically at narvaez.madonna@epa.gov.

Sincerely,



Jeff KenKnight, Manager
Federal and Delegated Programs Unit

cc: Gregg Dahmen, ODEQ, NWR

✓ Ernie Nimister, Manager, Environmental Compliance and Safety, Consolidated Metals Company, Portland, Oregon

REC'D. 8/6/2004

E

CC: Tom Duncan

F.Y.S.

Ernie N.

DEQ INSPECTION REPORT

Facility Name and Address: Consolidated Metco, Inc. 13940 N. Rivergate Blvd. Portland, OR 97203	Permit Number: 26-1890
	County: Multnomah

Inspection Date/Time: June 24, 2003 10:00 AM	Reason for Inspection: (check one)	Regularly scheduled inspection	X
		Complaint follow-up	
		Other (specify)	X

Permit Type: (check one)	ACDP	X	Inspection Type: (check two)	Comprehensive 07	X
	Title V			Informational 08	
				Announced	X
				Unannounced	

Inspector(s): (Name, Title and Agency)	Gregg Dahmen, PE, Environmental Engineer DEQ Northwest Region	<i>R13-G- AOB</i>
---	--	-------------------

Facility Representative(s): (Name, Title and Phone #)	Ernie Nimister, Plant Manager (503) 240-5493
--	---

Overview of Facility

Consolidated Metco, Inc. operates an aluminum foundry which uses mainly permanent steel molds (diecasting) and 1% sand molds. The furnaces melt aluminum ingots and internally-generated scrap such as chips, turnings, gates and risers. Aluminum melted in the scrap furnace is ladled into an operating furnace and then poured into molds. There are some heat treating operations, including furnaces, quench tanks and an aging furnace.

Pre-inspection File Review

This source was operating on a Minimal Source Permit issued in 1987 until a regular ACDP was issued on March 30th, 1998. The permit was reclassified in 2001 and became a Simple ACDP under new permitting rules. The baseline (1978) and new PSELs were based on the application for Renewal #14835, and were included in the 1998 permit action. The permit was to expire on 6/01/2000 and the renewal is being delayed due to the promulgation by EPA of the Secondary Aluminum NESHAP, 40 CFR Part 63, Subpart RRR.

Walk-through of Facility

This facility is designated a secondary aluminum facility, although no externally generated scrap is processed or melted here. The scrap metal or chips from machining

operations are contaminated with soluble oil used as coolant and lubricant for the machining operations. The chips are centrifuged to remove the oil and water, and then dried with hot air. The drying is at low temperatures and may or may not be subject to the new Secondary Aluminum NESHAP. The topic was discussed extensively during the visit

Permit Conditions Reviewed During Inspection

The following permit conditions were evaluated for compliance:

Permit Condition No.	Compliance Required	Compliance Status	Future Concerns
1., 2., 3.	Particulate emissions, opacity, nuisance conditions, odors and fugitive dust rules.	In Compliance	None.
4.	PM – Particulate Limit of 40.1 tons/yr or 919.2 lbs/day	In Compliance	Now is Simple Permit 24 tons/yr.
5.	NOx emission limit of 24.4 tons/yr or 127.2 lbs/day.	In Compliance	Now is Simple Permit 39 tons/yr.
6.	Carbon monoxide Plant Site Emission Limit of 4.9 tons/yr or 26.4 lbs/day.	In Compliance	Now is Simple Permit 99 tons/yr.
7.	VOC emission limit of 11.8 tons/yr or 1,468.8 lbs/day.	In Compliance	Now is Simple Permit 39 tons/yr.
11.	Dross is to be stored inside and disposed of offsite or sold for recycling.	In Compliance	None
12.	Special Condition – operate air pollution control equipment whenever process is running.	In Compliance	None
13., 14.	Monitoring and Reporting – Annual Report due Feb. 15 th .	In Compliance	Change to March 15th if desired by source

Review of Annual or Semi-Annual Reports

The 2001 Annual Report was received on January 16, 2002 and showed ConMetco to be in compliance. The 2002 Annual Report was received on January 15, 2003. The source was in compliance.

Other Discussions

The burning issue here is whether the chip dryer is subject to the Secondary Aluminum NESHAP. It is agreed that the furnaces are clean-charge and not subject to the NESHAP. It is the definition of a chip dryer that is vague and that has led to many discussions with EPA, ConMetco and consultants. This subject will be dealt with independent of this inspection.

Compliance Status of Facility

Is the facility in compliance?

<input checked="" type="checkbox"/>	Facility is in compliance with the permit conditions described above.
<input type="checkbox"/>	Facility is not in compliance with one or more of the permit conditions described above (provide additional detail below).

Is the facility under a compliance schedule to correct previous compliance problem(s)?

<input checked="" type="checkbox"/>	Facility is not under a compliance schedule to correct previous noncompliance.
<input type="checkbox"/>	Facility is on schedule to correct previous noncompliance.
<input type="checkbox"/>	Facility is not on schedule to correct previous noncompliance (provide additional detail below).

Is the facility under a compliance schedule to comply with future requirement(s)?

<input type="checkbox"/>	Facility is not under a compliance schedule for future requirement(s).
<input checked="" type="checkbox"/>	Facility is on schedule to meet future requirements of the Secondary Aluminum NESHAP if required. They may be exempt.
<input type="checkbox"/>	Facility is not on schedule to meet future requirement(s) (provide additional detail below).

AOB:GBD

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOURCE INSPECTION FORM

ERNIE NIMISTER

COUNTY: MULTNOMAH NWR-P

SOURCE NAME: CONSOLIDATED METCO, INC.

SOURCE ADDRESS: 13940 N RIVERGATE BLVD.
PORTLAND 97203503 240-5493
503 286-5741
☐ WQ
☐ SW
☒ AQ
☐ NC
OFFICIAL CONTACTED: ERNIE NIMISTER
ENTIRE SOURCE

TABLE A PARA	PREP. TIME	TRANS TIME	INSPECTION TIME	PAPER TIME
	3.0	1.0	4.0	4.0

PERMIT NUMBER		POINT	ACTION			DATE SCHEDULED			DATE ACHIEVED			RESULT	INSP. NO.
CO.	SOURCE		NO.		TYPE	MO.	DAY	YR.	MO.	DAY	YR.		
	1890	000	08	7	07	06	01	94	07-20-94			X	B-47

8.1

8.2

8.3

8.4

COMPLIANCE STATUS (RESULT CODE)

	IN COMP.	NOT IN COMPLI- ANCE	ON SCHEDULE
All permit conditions	<input checked="" type="checkbox"/>		
Permit emission limits	<input type="checkbox"/> R	<input type="checkbox"/> A	<input type="checkbox"/> I
Emission standards	<input type="checkbox"/> S	<input type="checkbox"/> B	<input type="checkbox"/> J
Performance reqts.	<input type="checkbox"/> T	<input type="checkbox"/> C	<input type="checkbox"/> K
Monitoring & Reporting	<input type="checkbox"/> U	<input type="checkbox"/> D	<input type="checkbox"/> L
Open burning limits	<input type="checkbox"/> V	<input type="checkbox"/> E	<input type="checkbox"/> M
Procedural Reqts.	<input type="checkbox"/> W	<input type="checkbox"/> F	<input type="checkbox"/> N
Fugitive emissions	<input type="checkbox"/> X	<input type="checkbox"/> G	<input type="checkbox"/> O
Other (opacity)	<input checked="" type="checkbox"/>	<input type="checkbox"/> H	<input type="checkbox"/> P

TREATMENT/PROCESS EQUIPMENT - ADDITIONAL REMARKS - OPERATING CONDITIONS

TWO (2) ELECTRIC REVERBATORY FURNACES
 NINE (9) GAS-FIRED REVERBATORY FURNACES
 ONE (1) BEAD BLASTER w/ baghouse
 ONE (1) SAND BLASTER w/ baghouse - NOT USED BUT STILL ON SITE
 REMOVED (1) CHIP RECLAIMING FURNACE w/ AFTERBURNER
 SEE ATTACHED REPORT DATED 7/21/94

SOURCES IN VIOLATION & LIMITS VIOLATED

COMPANY HAS A NOTICE OF INTENT TO CONSTRUCT APPLICATION
 DATED 7/8/94 RECEIVED 7/11/94 FOR GAS FIRED HEAT
 TREATING EQUIPMENT. THE NC IS BEING REVIEWED BY JIM BROAD

10/24/94
 J. B. Broad

Ernie A. Moore 7/21/94

SIGNATURE OF INSPECTOR AND DATE

SIGNATURE OF PERSON INTERVIEWED AND DATE

State of Oregon
Department of Environmental Quality

Memorandum

Date: July 21, 1994

To: File No. 26-1890
From: Beth Moore
Subject: AQ-Multnomah Co.
Consolidated Metco, Inc.

Location 13940 N. Rivergate Blvd.
Portland, OR 97203

Mailing Address P. O. Box 83201
Portland, OR

ERNIE NIMISTER
Mgr of Environmental Compliance & Safety

P.O. Box 83201
Portland, OR 97283-0201
TEL: (503) 240-5460-x493
26-5741

CONSOLIDATED METCO, INC.
13940 N. Rivergate Blvd.
Portland, OR 97203
FAX: (503) 240-5443

INSPECTION DATE: July 20, 1994

CONTACT: Ernie Nimister, Mgr. of Environmental Compliance & Safety

1. Odor survey: No odors detected downwind of the facility
2. Visible emissions: No visible emissions were observed from the stacks.
3. FUEL BURNING EQUIPMENT: The facility uses space heaters the annual total on natural gas consumption includes the space heaters because there is only one gas meter.
4. PROCESSES: Consolidated Metco, Inc. is an aluminum metal foundry. There are nine (9) gas-fired reverbatory furnaces and two (2) electric reverbatory furnaces. Nitrogen is used in the process. AP-42 describes reverbatory furnaces which use fluorine or chlorine in the process: neither is used at this facility.

Molten metal is purchased directly from the smelter and is delivered by truck in thermal crucibles. The gates and risers are the only scrap metal that is melted at the facility. Dross and other scrap metal (i.e. slag, grindings, saw chips and borings) are sent to a secondary smelter. The secondary smelter sends back a 1000 lb ingot (ingot is also called a "sow") from their scrap metal. The chip reclaiming furnace was removed from service.

Scrap metal and ingots are melted in No. 6 furnace. The No. 6 furnace has the capability to pump the melted metal from No. 6 furnace to the No. 1 holding furnace. A transfer crucible, which has the capacity of 1800 lbs., receives molten metal from the holding furnace. Small 5 lb ingots

Memo To: File
July 21, 1993
Page 2

are added to the molten metal in the transfer crucible to make the desired alloy. The molten metal in the transfer crucible is moved to a mixer and fluxed by adding powders that bring the oxides to the surface. What is skimmed off the surface is dross. The powders are sodium silicon fluoride, potassium aluminum fluoride, silicon tetrafluoride, and aluminum fluoride.

Then the transfer crucible is moved to any one of other reverberatory furnaces and the molten metal is poured. The reverberatory furnaces have mechanical equipment which pours the molten metal and tilts the mold. The gates and risers are cut off the cast metal after it is cooled. The mold is a solid piece of steel which is sprayed with a clay like material of mica and vermiculite in a water base. The mold is coated with a releasing agent (In the flow diagram this is referred to as painting - no VOC's are involved.) The bead blaster is used to clean the releasing agent off the mold before it is recoated.

There are several electric heat treating areas where the cast metal parts are heat treated, quenched with water and cured with electric heat to bring out the desired properties to the surface of the metal.

The cast parts are set out in the yard. The next step is machining. All of the machines have water based coolant and the parts are cleaned in water. The water is recycled.

The sand blaster is still in place but it is no longer used.

5. STACK TESTING: Consolidated Metco., Inc. has scheduled stack testing to obtain information on their particulate emissions. The company wants to show that the emission factors for secondary aluminum foundries in AP-42 do not apply to them. The emissions will also be used to determine their potential to emit.

David E. Like, Environmental Compliance Engineer, Brown and Caldwell was at the facility. Brown and Caldwell was setting up for a stack test on No. 6 scrap metal furnace. Three separate one (1) hour runs will be conducted using Method 5/202. A one (1) hour test run will be conducting during an idle phase, while charging gates and risers, and while charging ingot. A one hour sample result will be available for each of these phases.

Memo To: File
July 21, 1993
Page 3

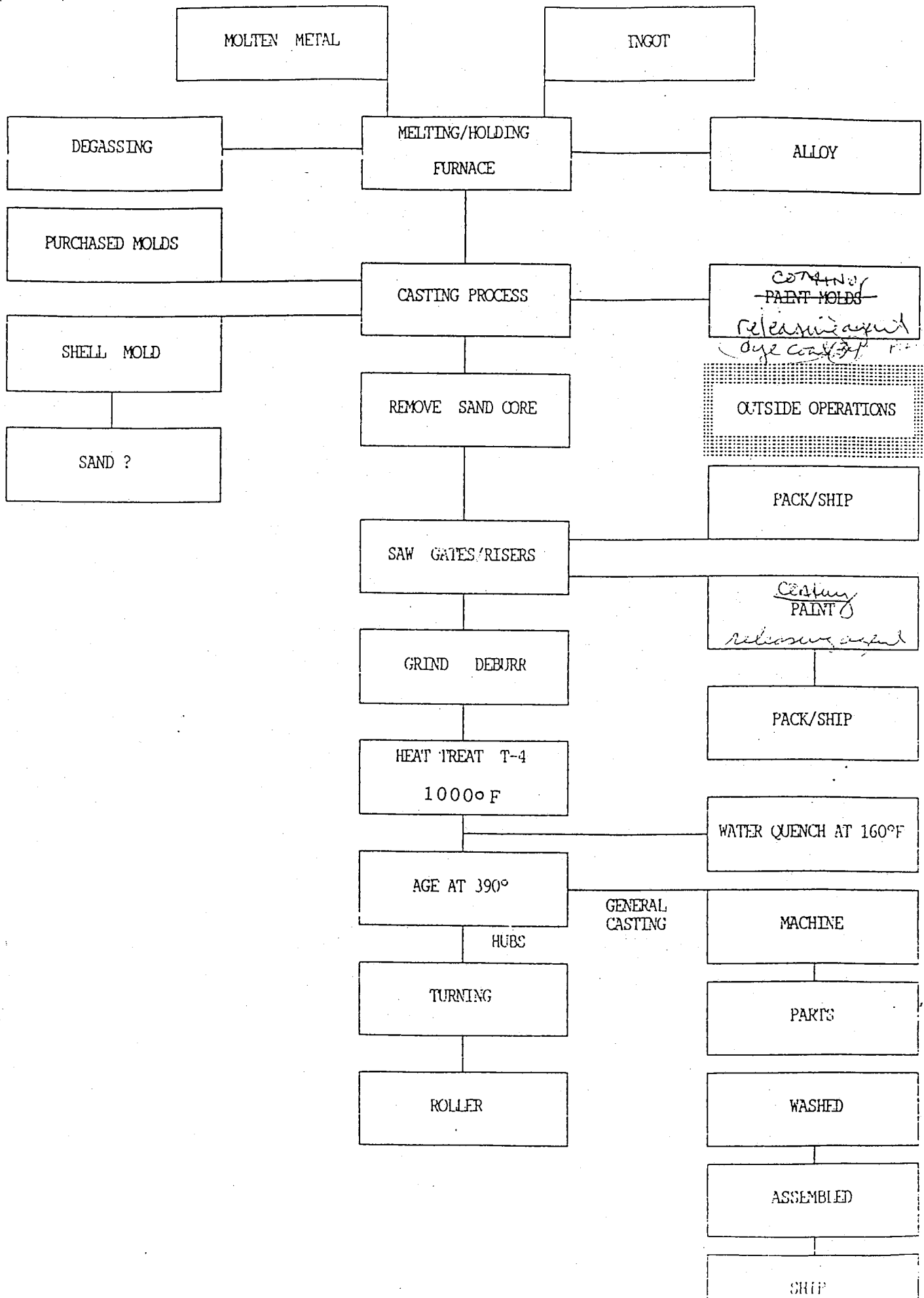
Four one hour test runs will be conducted on Hi Teq gas furnace No. 5 using Method 5/202. A one (1) hour test run will be conducted during cleaning, two fluxing process and a pouring.

Three ambient monitors will be set up in different locations throughout the facility to quantify their fugitive particulate emissions. The locations are shown in figure 1. The Sierra monitors will be run for 8 hours. The doors to the facility will be closed during that time.

6. Monitoring review (records check): This is a minimal permit and annual reporting is not required. Mr. Nimister provided the following information:
 - a. The 1993 annual fuel usage was 751,383 ccf.
 - b. The 1993 annual production was 8262 tons.
 - c. Operating hours are 24 hours per day, 5 days per week and an occasional saturday. Three shifts
7. Inspection indicates compliance with the minimal permit conditions. The stack test will give a better indication of what the emissions are. Keep the permit as a minimal permit until the permit renewal on 6/1/95.
8. Debriefed with Ernie Nimister.

cc: Air Quality Division: DEQ
CONMET.INS

PROCESS FLOWCHART



Vendor: LaGrand Industrial

Account: 200147161

PO#: 59192

Page - 1

ACHESON COLLOIDS COMPANY

Date - 8/28/90

Customer Number : 50401

SHIPPER NUMBER : 82221

MATERIAL SAFETY DATA SHEET

REVISION NO.: 001

REVISION DATE : 5/12/87 *

SECTION I - SOURCE AND NOMENCLATURE

Manufacturer's Name

ACHESON COLLOIDS COMPANY

Emergency Telephone No.

313-984-5581

Address

PO Box 611747 Port Huron, MI 48061-1747

Chemical Family

Vermiculite in Water

Trade Name and Synonyms

DAG 395

Chemical Name and Synonyms

Refractory Compounds in Water

SECTION II - OSHA REGULATED INGREDIENTS

C.A.S.

Reg.No. Material

Wgt %

Exposure

Limit

12001-25-2 Mica

10.00

20.00 MPPCF

1318-00-9 Vermiculite

4.00

15.00 MG/M3

SECTION III - PHYSICAL DATA

Boiling Point

212F Vapor Pressure 17.00

Vapor Density

N/A

Melting Point

N/A Evaporation Rate N/A

Volatile

62.0

Specific Gravity

1.32

Solubility in Water : Miscible

PhotoChemically Reactive: NU.O.C. : 0000Appearance/Odor

Thick Tan Paste; Bland Odor

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flash Point : N/A

FLAMMABLE (EXPLOSIVE) LIMITS

Upper

N/A

Lower

N/A

MethodExtinguishing Media

NONE.

Special Fire Fighting Procedures

NONE.

Unusual Fire and Explosion Hazards

NONE.

SECTION V - HEALTH HAZARD DATA

Effects of OverexposureInhalation

NO ACUTE EFFECTS EXPECTED WITHIN EXPOSURE LIMITS.

Ingestion

LOW ORDER OF TOXICITY.

Eye

MAY CAUSE TEMPORARY EYE IRRITATION.

Skin

REPEATED OR PROLONGED CONTACT CAN CAUSE IRRITATION AND DERMATITIS.

RECEIVED

SEP 19 1990

06. 11. 90 08:14 AM
JUN 07 '90 14:20 FOSECO BROOKPARK

FOSECO INC.

P02

P.2/4

Account#: 20014711

Vendor: Labrand

P.O.#: 58393

MATERIAL SAFETY DATA SHEET (29 CFR PART 1910.1200 - HAZARD COMMUNICATION)

SECTION 1 - IDENTIFICATION

MATERIAL/PRODUCT: DYCOTE 6
MANUFACTURER/DISTRIBUTOR: Foseco, Inc.
ADDRESS: 20200 Sheldon Road
Brook Park, Ohio 44142

MSDS REV. NO.: 2
DATE PREPARED: February 7, 1990
PREPARED BY: Trevor Hardy
TELEPHONE NO: (216) 826-4548

SECTION 2 - HAZARDOUS COMPONENTS

HAZARDOUS COMPONENT	CAS NO.	%	OSHA PEL (mg/M3)	ACGIH TLV (mg/M3)	OTHER LIMITS
Mica	12001-26-2	<20	3 (respirable)	3 (respirable)	N/A
Talc (non-asbestine)	14807-96-6	<30	2 (respirable)	2 (respirable)	N/A
Sodium Silicate Solution	1344-09-8	<30	15 (total)	10 (total)	N/A

SECTION 3 - PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING PT: 212°F SPECIFIC GRAVITY: 1.5
VAPOR PRESSURE: Same as water. EVAPORATION RATE: Same as water.
VAPOR DENSITY: N/A SOLUBILITY IN WATER: Contains water.
APPEARANCE AND ODOR: Light tan, viscous liquid. No odor.

SECTION 4 - FIRE AND EXPLOSION DATA

FLASH POINT: None FLAMMABLE LIMITS: Lel: N/A Uel: N/A
EXTINGUISHING MEDIA: Will not burn.
SPECIAL FIREFIGHTING PROCEDURES: N/A
UNUSUAL FIRE & EXPLOSION HAZARDS: N/A

SECTION 5 - REACTIVITY DATA

STABILITY: Stable
INCOMPATIBILITY: Acids
HAZARDOUS POLYMERIZATION: Will not occur.
HAZARDOUS DECOMPOSITION PRODUCTS: None

N/A = Not Applicable

N/K = Not Known

Page 2 of 3

MATERIAL/PRODUCT: DYCOTE 6

SECTION 6 - HEALTH HAZARD DATA

ROUTE(S) OF ENTRY: INHALATION (YES) SKIN (YES) EYES (YES) INGESTION (NO)
HEALTH HAZARDS: ACUTE Sodium silicate solutions have a high pH and so can be irritating to eyes, skin and mucous membranes. In extreme cases may cause eye burns.
HEALTH HAZARDS: CHRONIC Prolonged and/or repeated inhalation of mist from spraying or dust from dried product can cause lung fibrosis, due to mica and talc.
TOXICITY DATA: N/A
CARCINOGENICITY: NTP/IARC/OSHA/OTHER: N/A

SIGNS AND SYMPTOMS OF EXPOSURE: Eye, skin and respiratory irritation.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Pre-existing skin and respiratory ailments.

EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Remove person to fresh air.

SKIN: Wash with water; do not use soap.

EYES: Immediately flush with water for at least 15 minutes.

INGESTION: Drink large volumes of water. DO NOT INDUCE VOMITING. Refer to physician.

SECTION 7 - PRECAUTIONS FOR SAFE HANDLING AND USE

SPILLS/LEAKS: Soak up with inert absorbent material.

WASTE DISPOSAL: Dispose of in accordance with local, state and federal regulations.

HANDLING, USE AND STORAGE: Store below 150°F and keep from freezing. Keep containers closed when not in use to reduce evaporation. Do not transfer to non-ferrous containers such as aluminum or galvanized drums. Product can react to liberate hydrogen gas.

SECTION 8 - CONTROL MEASURES

RESPIRATORY PROTECTION: If PEL/TLV is exceeded use NIOSH approved mask.

VENTILATION: Recommended sufficient to maintain below PEL/TLV.

GLOVES: Rubber or PVC

EYE PROTECTION: Safety glasses.

OTHER: Barrier cream.

N/A = Not Applicable

N/K = Not Known

SIGNATURE OF PREPARER: *Mandy*

Please ensure that all persons coming into contact with this product are aware of the information contained in this MSDS Sheet. Information presented herein has been compiled from sources considered to be reliable and is accurate and reliable to the best of our knowledge and belief but is not guaranteed to be so. It is the user's responsibility to determine for himself the suitability of any material for a specific use and to adopt such safety precautions as may be necessary. If you need any further information from us to make the determinations which you must make to use this material safely, please contact the above named preparer.

FOSECO INC.

SUPPLIER NOTIFICATION

DYCOTE* 6

The above listed product contains no toxic chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372, based upon our knowledge of the raw materials comprising this product.

This notification is attached to the product Material Safety Data Sheet (MSDS) and must not be detached from the MSDS. Any copying or redistribution of the MSDS shall include copying and redistribution of this notice attached to copies of the MSDS subsequently redistributed.

Signature of Preparer: *Hardy*

* Registered Trademark

FOSECO INC.

Acc# 77-6339

716

MATERIAL SAFETY DATA SHEET (29 CFR PART 1910.1200 -HAZARD COMMUNICATION)

SECTION 1 - IDENTIFICATION

PRODUCT/TRADE NAME: DYCOTE 34 MANUFACTURER/DISTRIBUTOR: Foseco Inc.
SYNONYMS/CAS NAME: N/A - MIXTURE ADDRESS: 20200 Sheldon Road
CAS NO.: N/A - MIXTURE BrookPark, Ohio 44142
RECOMMENDED USE: Permanent Mold Coating EMERGENCY TEL. NO.: 216/826-4548
for Aluminum

SECTION 2 - HAZARDOUS INGREDIENTS

HAZARDOUS CHEMICAL	CAS NO.	% BY WT.	ACGIH TLV	LISTED BY
				RTECS AS CARCINOGEN
Silica	12001-26-2	<10	3mg/M3 Respirable	No
Talc (non asbestine)	14807-96-6	<20	2mg/M3 Respirable	No
Alumina	1344-28-1	<20	10mg/M3	No
Sodium Silicate solution	1344-09-8	>40	N/A	No

Note-sodium silicate solution has a pH in excess of 10 and so may be corrosive to skin and especially eyes.

INFORMATION IN SECTION 2 HAS BEEN EXCLUDED DUE TO TRADE SECRETS: YES ___ NO X

SECTION 3 - PHYSICAL DATA

PASTE: (X) GAS: (___) SOLID: (___) EVAPORATION RATE: Same as water
VAPOR PRESSURE: N/A SOLUBILITY IN WATER: Contains water BOILING PT: 212°F
VOLATILE BY WT: N/A S.G./APPARENT DENSITY: 1.7 VAPOR DENSITY (AIR=1): N/A
COLOR: N/A APPEARANCE & ODOR: Light tan paste - no odor.

SECTION 4 - FIRE, HAZARDS & REACTIVITY DATA

FLASH POINT: None FLAMMABLE LIMITS: Lel: N/A Uel: N/A
INCOMPATIBILITY: Acids
HAZARDOUS POLYMERIZATION: (No) CORROSIVE: (Yes) STABLE: (Yes) UNSTABLE: (___)
THERMAL DECOMPOSITION PRODUCTS: None

EXTINGUISHING MEDIA: Will not burn

SPECIAL FIREFIGHTING PROCEDURES: N/A

UNUSUAL FIRE & EXPLOSION HAZARDS: N/A

N/A = Not Applicable
/K = Information Unknown

PRODUCT: DYCOTE 34
(DYCOTE IS A REGISTERED TRADEMARK)

SECTION 5 - HEALTH HAZARDS DATA

SIGNS/SYMPTOMS/EFFECTS OF OVEREXPOSURE: Due to high pH may be irritating to skin and mucous membranes. Excessive inhalation of mist from spraying can cause fibrosis of the lungs.

PROBABLE ROUTES OF EXPOSURE : INHALATION: (X) SKIN: () EYES: () INGESTION: ()

EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Remove person to fresh air; call physician.

SKIN: Wash with water; do not use soap.

EYES: Flush with water for at least 15 min.; persistent pain refer to ophthalmologist.

INGESTION: Drink large volumes of water. Do not induce vomiting. Refer to physician immediately.

TOXICITY DATA: LC50: N/A

LD50: N/A

SECTION 6 - SPILL OR LEAK PROCEDURES

SPILLS/LEAKS: Soak up with absorbent material.

WASTE DISPOSAL: Dispose of in accordance with Local and other applicable regulations.

SECTION 7 - SPECIAL PROTECTION

RESPIRATORY PROTECTION: NIOSH approved for inorganic dusts.

VENTILATION: LOCAL EXHAUST: () MECHANICAL (GENERAL): (X)

SPECIAL: () OTHER: ()

GLOVES: Rubber or PVC EYE PROTECTION: Safety Glasses/Side Shields

OTHER CLOTHING: Barrier Cream.

SECTION 8 - SPECIAL PRECAUTIONS

HANDLING & STORING: Store in cool dry area below 150°F. Keep container tightly closed when not in use to reduce evaporation of water. DO NOT freeze.

OTHER PRECAUTIONS: Do not transfer to non ferrous containers such as aluminum or galvanized drums. Product can react to liberate hydrogen gas.

SECTION 9 - DOT INFORMATION

DOT SHIPPING NAME: N/A DOT HAZARD CLASS: N/A

DOT LABEL REQUIRED: N/A

N/A = Not Applicable
N/K = Information Unknown

PREPARED BY: Jerry Hardy
TITLE: PRODUCT DEVELOPMENT MANAGER
DATE: January 31, 1985

Please ensure that all persons coming into contact with this product are aware of the information contained in this MSDS Sheet. Information presented herein has been compiled from sources considered to be reliable and is accurate and reliable to the best of our knowledge and belief but is not guaranteed to be so. It is the user's responsibility to determine for himself the suitability of the material for a specific use and to adopt such safety precautions as may be necessary. If you need any further information from us to make the determinations which you must make to use this material safely, please contact the above named preparer.

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOURCE INSPECTION FORM

COUNTY: MULTNOMAHSOURCE NAME: CONSOLIDATED METCOOFFICIAL CONTACTED: CHUCK LIUIN, MAINT SUP

SOURCE ADDRESS:

13910 N RIVERGATE CLVD. Tim Silva
PORTLAND, OR 97203☐ WQ
☐ SW
☒ AQ
☐ NC

TABLE A PARA	PREF. TIME	TRANS. TIME	INSPECTION TIME	PAPER TIME
453	4	1.0	6	4

PERMIT NUMBER	POINTS	ACTION	DATE SCHEDULED	DATE ACHIEVED	RESULT	INSPEC. NO.
261890		7		10/17/86	Q	F0.4

8.1 OBSERVED ALL EMISSIONS VISUALLY IN COMPLIANCE

8.2

8.3

8.4

COMPLIANCE STATUS (RESULT CODE)

	IN COMP.	NOT IN COMPLIANCE	ON SCHEDULE
All permit conditions	<input checked="" type="checkbox"/>		
Permit emission limits	<input type="checkbox"/> R	<input type="checkbox"/> A	<input type="checkbox"/> I
Emission standards	<input type="checkbox"/> S	<input type="checkbox"/> B	<input type="checkbox"/> J
Performance reqts.	<input type="checkbox"/> T	<input type="checkbox"/> C	<input type="checkbox"/> K
Monitoring & Reporting	<input type="checkbox"/> U	<input type="checkbox"/> D	<input type="checkbox"/> L
Open burning limits	<input type="checkbox"/> V	<input type="checkbox"/> E	<input type="checkbox"/> M
Procedural Reqts.	<input type="checkbox"/> W	<input type="checkbox"/> F	<input type="checkbox"/> N
Fugitive emissions	<input type="checkbox"/> X	<input type="checkbox"/> G	<input type="checkbox"/> O
Other	<input type="checkbox"/> Y	<input type="checkbox"/> H	<input type="checkbox"/> P

TREATMENT/PROCESS EQUIPMENT - ADDITIONAL REMARKS - OPERATING CONDITIONS

BEAD-BLASTER BAGHOUSE
SAND- " " } ALL EMISSIONS
3 GAS-FIRED REVERB FURNACES } VISUALLY IN
8 ELECTRIC " } COMPLIANCE

AFTER BURNER ON CHIP RECLAIMING FURNACE
BURNS SMOKE FROM "TRIM-SOL" MACHINE-TOOL
COOLANT MSD SHEET FOR TRIM-SOL ATTACHED

SOURCES IN VIOLATION & LIMITS VIOLATED

Harry M. Demaray 10/17/86
SIGNATURE OF INSPECTOR AND DATE

C. P. Lewis
SIGNATURE OF PERSON INTERVIEWED AND DATE

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOURCE INSPECTION FORM

CHUCK LEVIN
503 286 5741
☐ WQ
☐ SW
☒ AQ
☐ NC

COUNTY: MULTNOMAH

SOURCE NAME: CONSOLIDATED METCO, INC.

SOURCE ADDRESS: 13940 N RIVERGATE BLVD.
PORTLAND 97203OFFICIAL
CONTACTED:

ENTIRE SOURCE

000

TABLE A PARA	PREP TIME	TRANS TIME	INSPECTION TIME	PAPER TIME
50				

PERMIT NUMBER		POINT	ACTION			DATE SCHEDULED			DATE ACHIEVED			RESULT	INSP. NO.
CO.	SOURCE		NO.		TYPE	MO.	DAY	YR.	MO.	DAY	YR.		
26	1890	000	07	7	07	06	01	89	9/7/89			QX	B32

8.1 Annual Inspection - All sources in compliance

8.2

8.3

8.4

COMPLIANCE STATUS (RESULT CODE)

	IN COMP.	NOT IN COMPLI- ANCE	ON SCHEDULE
All permit conditions	<input checked="" type="checkbox"/>		
Permit emission limits	<input type="checkbox"/> R	<input type="checkbox"/> A	<input type="checkbox"/> I
Emission standards	<input type="checkbox"/> S	<input type="checkbox"/> B	<input type="checkbox"/> J
Performance reqts.	<input type="checkbox"/> T	<input type="checkbox"/> C	<input type="checkbox"/> K
Monitoring & Reporting	<input type="checkbox"/> U	<input type="checkbox"/> D	<input type="checkbox"/> L
Open burning limits	<input type="checkbox"/> V	<input type="checkbox"/> E	<input type="checkbox"/> M
Procedural Reqts.	<input type="checkbox"/> W	<input type="checkbox"/> F	<input type="checkbox"/> N
Fugitive emissions	<input type="checkbox"/> X	<input type="checkbox"/> G	<input type="checkbox"/> O
Other	<input type="checkbox"/> Y	<input type="checkbox"/> H	<input type="checkbox"/> P

TREATMENT/PROCESS EQUIPMENT - ADDITIONAL REMARKS - OPERATING CONDITIONS

Aluminum Foundry

Sources: Band Blaster / Baghouse

Sand Blaster / Baghouse

Oil Recaimer / Afterburner

Gas and Electric Furnaces - Uncontrolled

All systems in full operation during inspection

No problems or visible emissions outside
the buildings noted.

All sources in compliance with permit.

SIGNATURE OF INSPECTOR AND DATE

SIGNATURE OF PERSON INTERVIEWED AND DATE